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July 25, 2025

**VIA CM/ECF**

Honorable Alan S. Trust  
United States Bankruptcy Court  
Eastern District of New York  
Alfonse M. D'Amato Federal Courthouse  
290 Federal Plaza, Courtroom 960  
Central Islip, New York 11722

Re: ***Goldner Capital Management LLC, et al. v. Capital Source, LLC, et al.***  
**Chapter 11, Lead Case No. 24-73789 (AST)**

Dear Chief Judge Trust:

This letter responds to Debtors' counsel's letter submitted earlier today (Dkt. 359).

While Debtors' counsel initially stated that he would file his own Rule 37 letter, the VHS Parties' counsel did not realize that, in a follow-up email, Debtors' counsel reversed his position and attached a new version of the letter with Debtors' position to be included in the joint Rule 37 Letter.

The failure to include Debtors' position in the joint Rule 37 letter was an inadvertent error and, had Debtors' counsel raised the matter with the VHS Parties' counsel before filing today's letter, the VHS Parties' counsel would have immediately corrected the error. The VHS Parties' counsel apologizes to the Court and to Debtors' counsel for any inconvenience caused by their error.

Sincerely,



Matthew J. Campos  
Daniel M. Weiskopf

DMW/MJC:td

cc: All Counsel of Record (vie CM/ECF)